

EXHIBIT D-5
VEASEY-LULAC
NON-COMPENSABLE

EXHIBIT D
NON-COMPENSABLE**BARON**

DATE	NEIL BARON	HOURS	Code
09/25/13	Review Motion for Intervention of True the Vote and Memorandum in Support filed (doc 38)	0.25	N
09/26/13	Review Order on the Motion in Intervention of True the Vote	0.10	N
01/03/14	Review Transcript Order for True the Vote Appeal (doc 141)	0.20	N
07/09/14	Review email from Jennifer Roscetti regarding Peggy Draper	0.30	N
07/27/16	Phone conferences with LDF regarding interim remedy	1.00	N
07/28/16	Phone conferences with Plaintiffs regarding interim	1.00	N
07/28/16	Phone conference with Veasey group regarding interim remedy	0.50	N
07/28/16	Review multiple emails with interim remedy proposal to Texas State General	0.50	N
07/30/16	Phone conference with Plaintiffs regarding final order on interim remedy and RI Declation	1.00	N

TOTAL 4.85

EXHIBIT D
NON-COMPENSABLE

BRAZIL AND DUNN

Date	User	Description	Billable Time/ Cost Price	Code
12/16/2013	Chad Dunn	Receive and review motions pro hac vice and proposed orders filed by Lynn Eisenberg and Richard Shordt	0.10	N
04/22/2014	Chad Dunn	Receive and review Notice of Appearance by Ben A. Donnell	0.10	N
05/22/2014	Chad Dunn	Receive and review court's order granting Unopposed Motion to Withdraw Plaintiff-Intervenor Maria Longoria Benevides	0.10	N
05/28/2014	Chad Dunn	Receive and review Notice of Appearance by Lindsey Wolf	0.10	N
06/17/2014	Chad Dunn	Receive and review court's order granting Unopposed Motion to Withdraw Plaintiff-Intervenor Michelle Bessiake	0.10	N
07/22/2014	Chad Dunn	Prepare and file Dallas County's Motion for Leave to Participate Amicus Curiae	0.10	N
08/22/2014	Chad Dunn	Receive and review court order granting Motion to Withdraw Plaintiff- Intervenor Joseph Palacios	0.10	N
08/22/2014	Chad Dunn	Receive and review court order granting Motion to Withdraw Plaintiff- Intervenor Hector Palacios	0.10	N
08/22/2014	Chad Dunn	Receive and review court order granting Motion to Withdraw Plaintiff- Intervenor Jose Flores	0.10	N
08/22/2014	Chad Dunn	Receive and review court order granting Motion to Withdraw Plaintiff- Intervenor AC Cuellar	0.10	N
08/22/2014	Chad Dunn	Receive and review Texas Association of Hispanic County Judges and County Commissioners' Motion to Withdraw Plaintiff-Intervenor Jose Flores	0.10	N
08/22/2014	Chad Dunn	Receive and review Texas Association of Hispanic County Judges and County Commissioners' Motion to Withdraw Plaintiff-Intervenor Joseph Palacios	0.10	N
09/02/2014	Chad Dunn	Receive and review Unopposed Motion to Withdraw Belinda Ortiz as Plaintiff	0.10	N

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BRAZIL AND DUNN

09/02/2014	Chad Dunn	Receive and review order granting Motion to Withdraw Belinda Ortiz as Plaintiff	0.10	N
09/04/2014	Chad Dunn	Receive and review court order granting Motion to Withdraw Plaintiff Peggy Draper Herman	0.10	N
09/16/2014	Chad Dunn	Receive and review Notice of Appearance by Adam W. Aston	0.10	N
10/28/2014	Chad Dunn	Receive and review court order granting Unopposed Motion for Richard Shordt to Withdraw as Attorney	0.10	N
12/16/2014	Chad Dunn	Telephone conference with counsel for brief rider for amicus	0.20	N
01/09/2015	Chad Dunn	Receive and review Unopposed Motion for Adam W. Aston to Withdraw as Attorney and proposed order	0.10	N
01/09/2015	Chad Dunn	Receive and review court order granting Unopposed Motion for Adam W. Aston to Withdraw as Attorney	0.10	N
01/16/2015	Chad Dunn	Receive and review Motion to Substitute Attorney Scott A. Keller in place of Jonathan F. Mitchell and proposed order	0.10	N
01/20/2015	Chad Dunn	Receive and review court order granting Motion to Substitute Attorney Scott A. Keller in place of Jonathan F. Mitchell	0.10	N
01/23/2015	Chad Dunn	Receive and review Notice of Appearance by Angela V. Colmenero	0.10	N
01/23/2015	Chad Dunn	Receive and review Notice of Appearance by Matthew H. Frederick	0.10	N
01/30/2015	Chad Dunn	Confer with counsel for amicus regarding deadline for filing brief	0.10	N
02/04/2015	Chad Dunn	Confer with counsel for amicus regarding consent to file brief	0.10	N
02/19/2015	Chad Dunn	Receive and review Unopposed Motion for Lindsey Elizabeth Wolf to Withdraw as Attorney and proposed order	0.10	N
02/19/2015	Chad Dunn	Receive and review court order granting Unopposed Motion for Lindsey Elizabeth Wolf to Withdraw as Attorney	0.10	N
03/02/2015	Chad Dunn	Confer with counsel regarding consent for amicus brief	0.10	N

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03/25/2015	Chad Dunn	Receive and review Motion for Ryan P. Haygood to Withdraw as Attorney	0.10	N
03/25/2015	Chad Dunn	Receive and review court order granting Motion for Ryan P. Haygood to Withdraw as Attorney	0.10	N
03/31/2015	Chad Dunn	Receive and review Court of Appeals order granting Unopposed Motion of Amici Curiae ACLU to supplement the record on appeal	0.10	N
05/28/2015	Chad Dunn	Receive and review Unopposed Motion for Danielle Conley to Withdraw as Attorney	0.10	N
05/29/2015	Chad Dunn	Receive and review court order granting Unopposed Motion for Danielle Conley to Withdraw as Attorney	0.10	N
06/11/2015	Chad Dunn	Receive and review Unopposed Motion for Mark Posner to Withdraw as Attorney	0.10	N
07/10/2015	Chad Dunn	Receive and review court order granting Unopposed Motion for Joshua James Bone to Withdraw as Attorney	0.10	N
09/03/2015	Chad Dunn	Receive and review court order granting Motion for Anna M. Baldwin to Withdraw as Attorney	0.00	N
03/16/2016	Chad Dunn	Confer with counsel regarding en banc amicus	0.10	N
03/25/2016	Chad Dunn	Conference call with co-counsel regarding amicus	0.10	N
04/20/2016	Chad Dunn	Confer with counsel regarding consent to file amicus	0.10	N
07/25/2016	Chad Dunn	Receive and review Unopposed Motion for Danielle M. Lang to Appear Pro Hac Vice and proposed order	0.10	N
07/25/2016	Chad Dunn	Receive and review Unopposed Motion for Samuel G. Olikier-Friedland to Appear Pro Hac Vice and proposed order	0.10	N
07/25/2016	Chad Dunn	Receive and review Unopposed Motion for Shoshana J. Krieger to Appear Pro Hac Vice and proposed order	0.10	N
07/26/2016	Chad Dunn	Multiple conferences regarding remedy and schedule for entry of remedy orders. Review court order regarding same	5.70	N

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BRAZIL AND DUNN

07/26/2016	Chad Dunn	Receive and review Unopposed Motion for Brendan Downes to Appear Pro Hac Vice and proposed order	0.10	N
07/26/2016	Chad Dunn	Receive and review Unopposed Motion for Jon Greenbaum to Appear Pro Hac Vice and proposed order	0.10	N
07/26/2016	Chad Dunn	Receive and review Joint Motion to Expedite the Interim Remedy Schedule	0.10	N
07/26/2016	Chad Dunn	Receive and review court order granting Joint Motion to Expedite the Interim Remedy Schedule	0.10	N
07/26/2016	Chad Dunn	Receive and review court orders granting Motion to Appear Pro Hac Vice for Danielle Lang, Samuel Olikier-Friedland, Shoshana Krieger, Brendan Downes and Jon Greenbaum	0.10	N
08/03/2016	Chad Dunn	Receive and review Submission of All Private Plaintiffs' and Plaintiff- Intervenors of Additional Term	0.10	N
08/03/2016	Chad Dunn	Receive and review Defendants' Brief Regarding Proposed Interim Remedial Plan	0.10	N
08/03/2016	Chad Dunn	Continue conferences on remedy orders. Multiple edits to submissions with remedy proposals	5.60	N
08/04/2016	Chad Dunn	Receive and review document regarding limited voting backup ballot filed by R. Allensworth	0.10	N
08/05/2016	Chad Dunn	Work on submission brief to court in support of remedy issues. Multiple conferences regarding same	4.20	N
08/05/2016	Chad Dunn	Receive and review United States' Response to Submissions of Additional Terms	0.10	N
08/05/2016	Chad Dunn	Receive and review Defendants' Response to Submissions of Additional Terms	0.10	N
08/05/2016	Chad Dunn	Receive and review Response of Private Plaintiffs and Plaintiffs- Intervenors to Defendants' Brief Regarding Proposed Interim Remedial Plan	0.10	N
08/06/2016	Chad Dunn	Continue conference calls and work on remedy documents	2.10	N

TOTAL 23

EXHIBIT D
NON-COMPENSABLE
BRAZIL AND DUNN

Date	User	Description	Billable Time/ Cost Price	Code
04/15/2014	Scott Brazil	Receive and review Notice of Appearance by Jennifer Roscetti	0.10	N
09/02/2014	Scott Brazil	Receive and review Unopposed Motion to Withdraw Belinda Ortiz as Plaintiff	0.10	N
09/04/2014	Scott Brazil	Receive and review court order granting Motion to Withdraw Plaintiff Peggy Draper Herman	0.10	N

TOTAL 0.3

EXHIBIT D
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CLC

<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>	<u>Code</u>
8.23.13	Draft of pro hac vice motion for Hebert	0.2	N
9.25.13	Review motion to intervene by True the Vote	0.5	N
	opposing True the Vote's motion to intervene	1.5	N
10.8.13	Review & edit litigation hold letter for True the Vote	0.3	N
11.11.13	Final revisions & review of litigation hold letter to		
	movant-intervenor True The Vote	0.4	N
12.11.13	Review order denying Intervention to True the Vote	0.2	N
12.13.13	Review True the Vote notice of appeal	0.1	N
	withdrawal of prior notice of appeal	0.1	N
2.23.14	Draft motion pro hac vice for co-counsel Emma Simson	0.2	N
3.28.14	Review letter re: record on appeal (True The Vote appeal)	0.1	N
5.16.14	Final edits to Opposition to TTV stay & motion to expedite	0.8	N
7.21.14	Review and Draft Dallas County amicus motion	0.3	N
7.22.14	Final edits to Dallas County amicus motion	0.2	N
	motion to stay but expediting appeal	0.1	N
8.26.14	Review Josh Bone's pro hac vice motion	0.1	N
9.15.14	Prepare motion for co-counsel to withdraw (Simson)	0.1	N
7.9.15	Draft Josh Bone motion to withdraw as counsel	0.2	N
7.10.15	Review Order granting Josh Bone motion to withdraw	0.1	N
TOTAL		5.5	

EXHIBIT D
NON-COMPESNABLE

CLC

<u>Daniel Lang Description</u>	<u>Date</u>	<u>Time</u>	<u>Code</u>
ECF registration and pro hac vice motion at district court level	7/25/2016	1.0	N
Review of SOS documents for interim remedy and proposed edits	8/11/2016	0.5	N
Reviewing Texas cert petition	9/23/2016	0.4	N
Reviewing Texas cert petition	9/26/2016	0.8	N
Call from Texas voter re: misinformation from SOS	9/28/2016	0.4	N
Monitoring compliance of materials with consent decree	9/28/2016	0.3	N
Monitoring compliance of materials with consent decree	10/4/2016	0.1	N
Review of tarrant county and election committee hearing comments on voter id enforcement	10/13/2016	0.2	N
Drafting opp cert	11/19/2016	2.5	N
Drafting opp cert	11/20/2016	0.6	N
Drafting opp cert	11/20/2016	0.4	N
Drafting opp cert	11/21/2016	0.7	N
Call with litigation team re: opp cert	11/22/2016	0.3	N
Edits to opp cert	11/22/2016	0.5	N
Edits to opp cert	11/23/2016	2.1	N
Edits to opp cert	11/26/2016	2.3	N
Edits to opp cert (record cites)	11/28/2016	0.4	N
Reviewing scotus order denying cert	1/23/2017	0.4	N
Reviewing scotus order denying cert	1/23/2017	0.7	N
Research for opposition to Texas motion to dismiss	7/2/2018	0.2	N
Research for opposition to Texas motion to dismiss	7/3/2018	0.8	N
Research for attorneys fees motion	1/23/2019	1.2	N
Drafting and editing brief in support of at	3/11/2019	2.8	N
Call re attorneys fees motion	3/13/2019	0.3	N
Drafting and editing brief in support of at	3/13/2019	2.5	N
Edits to brief in support of attorneys fees	4/1/2019	0.8	N

TOTAL **23.2**

NON-COMPESNABLE**CLC**

J. Bone Description	Date	Time	Code
File E. Simson Motion to Withdraw	9/15/2014	0.2	N
Research on purpose argument	2/2/2015	3.2	N
TOTAL		3.4	

EXHIBIT D
NON-COMPESNABLE

CLC

<u>Emma Simson Description</u>	<u>Date</u>	<u>Hours</u>	<u>Code</u>
Training on Crivella West document review	4/14/2014	1.0	N
Research on poll tax issue	7/14/2014	0.8	N
Research on poll tax issue	7/14/2014	0.3	N
Draft of motion to compel on interrogatories, research on poll tax	7/14/2014	2.3	N
Research on poll tax issue	7/29/2014	5.3	N
Research poll tax	7/29/2014	0.4	N
Document review, drafting proposed order re Herron, research on other states' voter ID laws, legal research and drafting COL poll tax claim	8/11/2014	8.3	N
TOTAL		18.4	

EXHIBIT D
NON-COMPENSABLE
ALTMAN DERFNER

Derfner & Altman, LLC Armand G. Derfner, Esquire				
Jun-10-14	Tel Rosenberg re: legislator depositions, including review leg. depositions from Section 5 case.	2.50		N
Jul-30-14	Draft Poll tax argument, including research in memo and cases.	7.50	(2.50)	N
Jul-31-14	Draft Poll tax.	2.00		N
Aug-01-14	Draft Equal Protection claim (new citizenship requirement).	7.00		N
Aug-14-14	FOF/COL Crawford, Poll tax.	10.00	(2.00)	N
Aug-15-14	FOF/COL Crawford, Poll tax.	10.00	(2.00)	N
Aug-16-14	FOF/COL Crawford, Poll tax.	10.00	(2.00)	N
Aug-17-14	FOF/COL Crawford, Poll tax.	10.00	(2.00)	N
Aug-18-14	FOF/COL Crawford, Poll tax.	10.00	(2.00)	N
Aug-19-14	FOF/COL Crawford, Poll tax.	10.00	(2.00)	N
Aug-20-14	FOF/COL.	10.00	(2.00)	N
Aug-22-14	Footnotes.	12.00	(4.00)	N
Feb-06-15	Begin drafting poll tax section.	0.50		N
Feb-07-15	Draft poll tax argument.	6.00		N
Feb-17-15	Draft Crawford section	6.50		N
Apr-05-15	Research on Swint and related cases re: appropriate relief upon holding of legal error in applying legal rules to make a finding of intent; email to Veasey team re: same.	2.50		N
Apr-08-15	Memo re: Issue of limited discriminatory purpose.	1.50		N
5/3/2016	Draft Brief in detail, research Section 2 cases, FHA case, Section 2 analogues, mootness cases re poll tax	10.50	(2.50)	N
7/23/2016	review interim remedy, reasonable impediment affidavit, review other TX forms for language	6.30		N
7/25/2016	Analyze form and other forms for Interim Remedy, Motion to Expedite, Conference Calls	4.50	(1.00)	N
7/26/2016	Conf calls re remedy, review WI Order, NC amicus brief	6.30	(1.00)	N
		106.6	25.0	
TOTAL		81.0		